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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California  
corporation, *et al.*,<sup>1</sup>

Debtors.

Case No.: 24-10545

(Jointly Administered)

Chapter 11

**EX PARTE APPLICATION OF THE  
OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FOR ENTRY OF AN ORDER  
PURSUANT TO BANKRUPTCY RULE 2004  
AUTHORIZING ORAL EXAMINATION OF  
AND PRODUCTION OF DOCUMENTS BY  
STEWART TITLE OF CALIFORNIA, INC.  
AKA STEWART TITLE OF  
SACRAMENTO; DECLARATION OF  
STEVEN W. GOLDEN, ESQ.**

<sup>1</sup> The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in the above-captioned chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned chapter 11 bankruptcy cases (the “Cases”) hereby files this *ex parte* application (the “Application”) under Federal Rule of Bankruptcy Procedure 2004 (“Rule 2004”) and Local Bankruptcy Rule 2004-1 (“Local Rule 2004-1”) for entry of an order authorizing the Committee to issue a subpoena to **Stewart Title of California, Inc. aka Stewart Title of Sacramento** (“Stewart”).

The Committee’s proposed subpoena will provide that Stewart shall (a) complete its production, by **April 4, 2025**, of documents responsive to the Requests for Production (the “Requests”) set forth substantially in the form attached hereto as **Exhibit 1**, and (b) provide oral testimony (the “Oral Testimony”), on a mutually agreed date no later than **April 30, 2025** (unless the Committee and Stewart agree to extend that date) relating to (i) Stewart’s search for and possession, custody, or control of documents responsive to the Requests; and (ii) the subject matter of the Requests.

## I. PRELIMINARY STATEMENT

As set forth in the First-Day Declaration of Bradley Sharp, the Debtors’ Chief Restructuring Officer, Kenneth Mattson, one of the Debtors’ founders and former principals, “appears to have used LeFever Mattson to facilitate a years-long campaign of self-serving transactions, many of which were not recorded in the books and records of LeFever Mattson, the Debtor, or any of the other LPs or LLCs (collectively, the “Mattson Transactions”).”<sup>2</sup> The Committee’s professionals are conducting an investigation (the “Committee Investigation”) into the Mattson Transactions (including the Mattson Interest Sales and Mattson Property Sales, each as defined in the First-Day Declaration), and other potential claims and causes of action that may be asserted against non-Debtors.

Mr. Sharp further described one category of Mattson Transactions as follows:

Mr. Mattson caused certain of the LPs and LLCs to purchase properties owned by Mr. Mattson’s own investment company—by executing the transactions himself on behalf of

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<sup>2</sup> See Declaration of Bradley D. Sharp in Support of Chapter 11 Petitions and First Day Motions [Docket No. 5] (the “First-Day Decl.”), ¶ 27.

both buyer and seller (collectively, the “Mattson Property Sales”). . . . The Mattson Property Sales have clouded title on a significant portion of the LeFever Mattson real estate portfolio, and a number of LPs and LLCs now hold properties, obtained through Mattson Property Sales, that are encumbered by loans that are in default.<sup>3</sup>

Based on the Committee Investigation thus far, the Committee believes that Mr. Mattson and/or his non-Debtor investment vehicles are in the chain of title of a significant portion of the Debtors’ property portfolio, both as of the Petition Dates in these cases and historically. Based on its review of available information, the Committee believes that Stewart, as a title company involved in some transactions in which the Debtors purchased and/or sold real property (including Mattson Property Sales), may have records that will assist the Committee in evaluating the chain of title to that “significant portion of the LeFever Mattson real estate portfolio,” and, in turn, various potential claims and causes of action that are the subject of the Committee Investigation. This information is critical to a determination interests of a variety of parties in these bankruptcy cases, including the investors in LeFever Mattson who, based on the filed proofs of claim and interest, constitute a majority of the Committee’s constituency.

## II. FACTUAL BACKGROUND

Over the course of two months in 2024,<sup>4</sup> each of the Debtors filed a voluntary petition for relief in this Court under chapter 11 of the Bankruptcy Code. The United States Trustee appointed the Committee on October 9, 2024.<sup>5</sup> On November 1, 2024, the Court granted the Committee’s application to employ Pachulski Stang Ziehl & Jones LLP as its counsel, effective as of October 13, 2024.<sup>6</sup>

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<sup>3</sup> See *id.*, ¶ 17.

<sup>4</sup> The Debtors filed bankruptcy petitions on August 6, 2024; September 12, 2024; and October 2, 2024 (collectively, the “Petition Dates”).

<sup>5</sup> See Docket No. 135.

<sup>6</sup> See Docket No. 250.

### III. JURISDICTION

This Court has subject matter jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought herein are §§ 1103 and 1109(b) of the Bankruptcy Code, and Rule 2004.

### IV. RELIEF REQUESTED

The Committee respectfully requests that the Court enter an *ex parte* order authorizing the Committee to issue a subpoena requiring Stewart to (a) complete its production, by **April 3, 2025**, of documents responsive to the Requests set forth substantially in the form attached hereto as **Exhibit 1**, and (b) provide Oral Testimony, on a mutually agreed date no later than **April 29, 2025** (unless the Committee and Stewart agree to extend that date) relating to (i) Stewart's search for and possession, custody, or control of documents responsive to the Requests; and (ii) the subject matter of the Requests.

### IV. BASIS FOR RELIEF

Local Rule 2004-1 provides as follows: "The Clerk may issue on behalf of the Court, *ex parte* and without notice, orders granting applications for examination of an entity pursuant to Bankruptcy Rule 2004(a)."<sup>7</sup> The Committee brings this Application *ex parte* pursuant to Local Rule 2004-1 seeking an order without need for a hearing. The Committee understands that Stewart reserves the right to interpose objections to the underlying document requests after the issuance of the subpoena. However, objections to the underlying document requests are not grounds to oppose or delay the granting of this Application.

Rule 2004(a) provides that "[o]n motion of any party in interest, the court may order the examination of any entity."<sup>8</sup> Rule 2004 is primarily used for "revealing the nature and extent of the

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<sup>7</sup> L.B.R. 2004-1(a).

<sup>8</sup> Fed. R. Civ. P. 2004(a).

1 bankruptcy estate, and for discovering assets, examining transactions, and determining whether  
2 wrongdoing has occurred.”<sup>9</sup>

3 Pursuant to Rule 2004(b), a party in interest may seek both document and oral discovery  
4 related to “acts, conduct, or property or to the liabilities and financial condition of the debtor, or to  
5 any matter which may affect the administration of the debtor’s estate, or to the debtor’s right to a  
6 discharge.”<sup>10</sup> Under Rule 2004(c), the “attendance of an entity for examination and for the production  
7 of documents . . . may be compelled as provided in Rule 9016 for the attendance of a witness at a  
8 hearing or trial.”<sup>11</sup> Federal Rule of Bankruptcy Procedure (“Bankruptcy Rule”) 9016 makes Rule 45  
9 of the Federal Rules of Civil Procedure (governing subpoenas) applicable in cases under the  
10 Bankruptcy Code. Unlike discovery under the Federal Rules of Civil Procedure (the “Civil Rules”),  
11 discovery under Rule 2004 can be a “pre-litigation discovery device.”<sup>12</sup> As such, a Rule 2004 motion  
12 need not be tied to specific factual allegations at issue between parties.<sup>13</sup> Moreover, the scope of a  
13 Rule 2004 oral examination is broader than that of discovery under the Civil Rules or the Bankruptcy  
14 Rules governing adversary proceedings.<sup>14</sup> In fact, courts have recognized that Rule 2004  
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18 <sup>9</sup> *In re Kelton*, 389 B.R. 812, 820 (Bankr. S.D. Ga. 2008); *see also In re Lufkin*, 255 B.R. 204, 208 (Bankr. E.D. Tenn.  
19 2000) (purpose of Rule 2004 is to “determine the condition, extent, and location of the debtor’s estate in order to  
20 maximize distribution to unsecured creditors”); *In re Bennett Funding Grp., Inc.*, 203 B.R. 24, 28 (Bankr. N.D.N.Y. 1996)  
(purpose of Rule 2004 is to assist in “revealing the nature and extent of the estate, and to discover assets of the debtor  
21 which may have been intentionally or unintentionally concealed”).

22 <sup>10</sup> Fed. R. Civ. P. 2004(b).

23 <sup>11</sup> Fed. R. Civ. P. 2004(c).

24 <sup>12</sup> *In re Wilson*, 413 B.R. 330, 336 (Bankr. E.D. La. 2009).

25 <sup>13</sup> *In re Symington*, 209 B.R. 678, 683 (Bankr. D. Md. 1997) (Bankruptcy Rule 2004 permits “examination of any party  
without the requirement of a pending adversary proceeding or contested matter”).

26 <sup>14</sup> *In re Ecam Publ’ns, Inc.*, 131 B.R. 556, 559 (Bankr. S.D.N.Y. 1991); *see also In re Drexel Burnham Lambert Grp.,*  
27 *Inc.*, 123 B.R. 702, 711 (Bankr. S.D.N.Y. 1991) (“[T]he scope of a Rule 2004 examination is very broad. Rule 2004  
discovery is broader than discovery under the Federal Rules of Civil Procedure.”).

1 examinations may be “broad” and “unfettered,” and can legitimately be in the nature of a “fishing  
2 expedition.”<sup>15</sup>

3 Whether to allow the requested discovery rests within the sound discretion of the Court.<sup>16</sup>  
4 Bankruptcy courts may allow a Rule 2004 examination of “third parties who have had dealings with  
5 the debtor,”<sup>17</sup> “to allow inquiry into the debtor’s acts, conduct or financial affairs so as to discover the  
6 existence or location of assets of the estate,”<sup>18</sup> “unearthing frauds,”<sup>19</sup> or to assist in recovering assets  
7 for the benefit of a debtor’s creditors.<sup>20</sup>

8 In addition, section 105(a) of the Bankruptcy Code authorizes the Court to “issue any  
9 order . . . that is necessary or appropriate to carry out the provisions of this title.”<sup>21</sup> The proposed  
10 discovery will, among other things, assist the Committee to fulfill its statutory duty to “investigate the  
11 acts, conduct, assets, liabilities, and financial condition of the debtor.”<sup>22</sup> The relief requested in this  
12 Application will not reduce or expand the substantive rights of any party to object to or modify the  
13 information requested by the Committee.

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15 <sup>15</sup> *In re Subpoena Duces Tecum & Ad Testificandum Pursuant to Fed. R. Bankr. P. 2004*, 461 B.R. 823, 829 (Bankr. C.D.  
16 Cal. 2011) (citation omitted); *see also In re Countrywide Home Loans, Inc.*, 384 B.R. 373, 400 (Bankr. W.D. Pa. 2008); *In*  
17 *re Bennett Funding Grp.*, 203 B.R. at 28 (purpose of Rule 2004 is to assist in “revealing the nature and extent of the estate,  
18 and to discover assets of the debtor which may have been intentionally or unintentionally concealed”); *In re Valley Forge*  
19 *Plaza Assocs.*, 109 B.R. 669, 674 (Bankr. E.D. Pa. 1990).

20 <sup>16</sup> *See, e.g., In re Hammond*, 140 B.R. 197, 200 (S.D. Ohio 1992).

21 <sup>17</sup> *In re Fearn*, 96 B.R. 135, 138 (Bankr. S.D. Ohio 1989); *see also In re W&S Invs., Inc.*, No. 91-35830, 1993 U.S. App.  
22 LEXIS 2231, at \*5-6 (9th Cir. Jan. 28, 1993) (unpublished disposition) (Rule 2004 is a “broadly construed discovery  
23 device which permits any party in interest in a bankruptcy proceeding to move for a court order to examine any entity...,”  
24 the “scope of inquiry permitted under a Rule 2004 examination is generally very broad and can ‘legitimately be in the  
25 nature of a ‘fishing expedition.’”) (citation omitted).

26 <sup>18</sup> *In re Dinubilo*, 177 B.R. 932, 940 (E.D. Cal. 1993).

27 <sup>19</sup> *Dynamic Fin. Corp. v. Kipperman (In re N. Plaza, LLC)*, 395 B.R. 113, 122 n.9 (S.D. Cal. 2008) (citations omitted).

28 <sup>20</sup> *See In re Vantage Petroleum Corp.*, 34 B.R. 650, 651 (Bankr. E.D.N.Y. 1983) (allowing discovery under Rule 2004 to  
help the debtor “discover and recover assets for benefit of creditors of the debtor”).

<sup>21</sup> 11 U.S.C. § 105(a).

<sup>22</sup> *Id.* § 1103(c)(2).

Here, the requested relief is well within the scope of Rule 2004. The Committee seeks to exercise its fiduciary duties to represent all of the unsecured creditors in these Cases, which necessarily requires identifying all of those unsecured creditors. The Committee also seeks maximize the amount of creditors' recoveries in this Cases. As such, the Committee needs the information from Stewart pertaining to the identity of as yet unknown investors/unsecured creditors, and the Debtors' assets, liabilities, and operations.

**V. NO PRIOR REQUEST**

No prior request for the relief sought in this Application has been made to this or any other Court.

**VI. NOTICE**

Local Rule 2004-1 provides that this Application can be brought "ex parte and without notice." L.B.R. 2004-1(a). Nevertheless, notice of this Application will be provided to (a) Stewart's agent for service of process; (b) the Office of the United States Trustee; (c) counsel to the Debtors; and (d) all ECF recipients.

**VII. CONCLUSION**

For the reasons set forth above, the Committee respectfully requests that the Court grant this Application. A proposed order granting this Application is attached hereto as **Exhibit 3**.

Dated: March 10, 2025

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**EXHIBIT 1**  
**Requests for Production of Documents**

**DEFINITIONS**

1. “ALL” shall be construed as encompassing “EACH” and “ANY”.
2. “ANY” shall be construed as encompassing “EACH” and “ALL”.
3. “COMMITTEE” means the Official Committee of Unsecured Creditors appointed in the CHAPTER 11 CASES.
4. “COMMUNICATION” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).
5. “CONCERNING” means relating to, evidencing, supporting, negating, refuting, embodying, containing, memorializing, comprising, reflecting, analyzing, approving, authorizing, constituting, describing, identifying, referring to, referencing, discussing, indicating, connected with or otherwise pertaining in ANY way, in whole or in part, to the subject matter being referenced.
6. “DEBTORS” means, individually and collectively, EACH of the ENTITIES listed on Appendix 1 hereto, and EACH of their agents, accountants, financial advisors, attorneys, employees, officers, directors, direct or indirect shareholders, members, representatives, affiliates, subsidiaries, predecessors, and/or successors.
7. “DOCUMENT” is synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate DOCUMENT within the meaning of the word DOCUMENT. A DOCUMENT includes written COMMUNICATIONS.
8. “EACH” shall be construed as encompassing “ALL” and “ANY”.
9. “ENTITY” shall have the meaning ascribed to such term in 11 U.S.C. § 101(15).

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10. “IDENTIFIED ENTITY” means ANY ENTITY identified on the attached Appendix 3 and such IDENTIFIED ENTITY’s agents, accountants, financial advisors, attorneys, employees, officers, directors, direct or indirect shareholders, members, partners, representatives, affiliates, subsidiaries, predecessors, and/or successors.

11. “IDENTIFIED PROPERTY” means ANY real property identified on the attached Appendix 2.

12. “IDENTIFY” means, to provide a person’s full name; the person’s present or last known address; and the person’s present or last known place of employment.

13. “INCLUDING” means “including, without limitation” and “including, but not limited to”.

14. “LEFEVER” means Timothy LeFever and his agents, accountants, financial advisors, attorneys, employees, representatives, and/or family members.

15. “MATTSON” means Kenneth Mattson and his agents, accountants, financial advisors, attorneys, employees, representatives, and/or family members.

16. “REQUESTS” means the Requests for Production set forth below.

17. “YOU” and “YOUR” means Stewart Title of California, Inc. aka Stewart Title of Sacramento, and its agents, accountants, financial advisors, attorneys, employees, officers, directors, direct or indirect shareholders, members, representatives, affiliates, subsidiaries, predecessors, and/or successors.

### INSTRUCTIONS

A. Unless otherwise specified, the REQUESTS seek DOCUMENTS dated or created on and after January 1, 2000.

B. YOUR responses to the REQUESTS are subject to ALL applicable Federal Rules of Bankruptcy Procedure and this Court’s Local Rules.

- C. Please bates number EACH page of EACH DOCUMENT that YOU produce.
- D. YOU are required to conduct a thorough investigation and produce ALL DOCUMENTS in YOUR possession, custody, and control.
- E. In the REQUEST, the use of the singular form of ANY word includes the plural and vice versa. The words “and” and “or” shall both be conjunctive and disjunctive.
- F. If YOU are unable to produce DOCUMENTS responsive to ANY REQUEST but DOCUMENTS responsive to the REQUEST exist, provide a written DOCUMENT containing the following information:
1. The date of the DOCUMENT;
  2. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
  3. The name, address, telephone number and title of the author(s) of the DOCUMENT;
  4. The name, address, telephone number and work title of EACH recipient of the DOCUMENT;
  5. The number of pages in the DOCUMENT;
  6. The document control number, if ANY;
  7. The present location(s) of the DOCUMENT and the name, address and telephone number of the person(s) who has/have possession of the DOCUMENT;
  8. A specific description of the subject matter of the DOCUMENT;
  9. The reason why YOU cannot produce the DOCUMENT.
- G. YOU are under a continuing duty to amend YOUR written responses to the REQUESTS and to produce additional DOCUMENTS if the written responses or document production is incomplete or incorrect in ANY material respect, and if the additional or corrective information has not otherwise been made known to the COMMITTEE.
- H. YOU are required to produce the full and complete originals (in native format, if electronic), or copies if the originals are unavailable, of EACH DOCUMENT responsive to the REQUESTS along with ALL non-identical copies and drafts in their entirety. A copy may be produced in lieu of originals if the entirety (front and back where appropriate) of the

- DOCUMENT is reproduced and YOU state by declaration under penalty of perjury that the copy provided is a true, correct, complete, and accurate duplication of the original.
- I. Produced DOCUMENTS must include ALL exhibits, attachments, and ANY other DOCUMENTS otherwise appended to another DOCUMENT.
- J. For ELECTRONICALLY STORED INFORMATION (“ESI”):
1. Produce DOCUMENTS in accordance with the instructions at <https://support.everlaw.com/hc/en-us/articles/360004962052-Standard-Format-for-Processed-Data>
  2. Produce ESI in its native format.
  3. Maintain family integrity.
  4. Perform custodian-level de-duplication.
  5. Produce a DAT load file with the following metadata fields: Beginning Production Number, Ending Production Number, Beginning Attachment Number, End Attachment Number, Family ID, Page Count, Custodian, Original Location Path, Email Folder Path, Document Type, Doc Author, Doc Last Author, Comments, Categories, Revisions, File Name, File Size, MD5 Hash, Date Last Modified, Time Last Modified, Date Created, Time Created, Date Last Accessed, Time Last Accessed, Date Sent, Time Sent, Date Received, Time Received, To, From, CC, BCC, Email Subject, Path to Native, Path to Full Text, Original Time Zone.
  6. Process ESI in Pacific Time Zone and provide a metadata field indicating original time zone.
- K. If YOU withhold or redact a portion of ANY DOCUMENT under a claim of privilege or other protection, then the DOCUMENT must be identified on a privilege log, which shall be produced contemporaneously with the non-privileged DOCUMENTS responsive to this REQUEST, and which privilege log shall state the following information:
1. The date of the DOCUMENT;

2. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
3. The name, address, telephone number and title of the author(s) of the DOCUMENT;
4. The name, address, telephone number and work title of EACH recipient of the DOCUMENT;
5. The number of pages in the DOCUMENT;
6. The document control number, if ANY;
7. The present location(s) of the DOCUMENT and the name, address and telephone number of the person(s) who has/have possession, custody, or control of the DOCUMENT;
8. A general description of the subject matter of the DOCUMENT or the portion redacted without disclosing the asserted privileged or protected COMMUNICATION;
9. The specific privilege(s) or protection(s) that YOU contend applies.

### **REQUESTS FOR PRODUCTION**

#### **REQUEST FOR PRODUCTION NO. 1:**

ALL DOCUMENTS CONCERNING ANY of the DEBTORS listed on Appendix 1, attached.

#### **REQUEST FOR PRODUCTION NO. 2:**

ALL DOCUMENTS CONCERNING ANY of the IDENTIFIED PROPERTIES listed on Appendix 2, attached.

#### **REQUEST FOR PRODUCTION NO. 3:**

ALL DOCUMENTS CONCERNING ANY of the IDENTIFIED ENTITIES listed on Appendix 3, attached.

**REQUEST FOR PRODUCTION NO. 4:**

ALL DOCUMENTS BETWEEN YOU on the one hand, and ANY of the following, on the other hand: (a) MATTSON, AND (b) LEFEVER.

-end-

## Appendix 1 – Debtors

Debtor Name	Petition Date	Tax ID	Case No.
Apan Partners LLC	9/12/2024	N/A	24-10487
Autumn Wood I, LP	9/12/2024	20-0164208	24-10488
Bay Tree, LP	9/12/2024	82-1071378	24-10489
Beach Pine, LP	9/12/2024	83-2643272	24-10490
Bishop Pine, LP	9/12/2024	83-2643038	24-10491
Black Walnut, LP	9/12/2024	47-2451858	24-10492
Buck Avenue Apartments, LP	9/12/2024	54-2090323	24-10493
Buckeye Tree, LP	9/12/2024	88-2980108	24-10494
Bur Oak, LP	9/12/2024	87-4699497	24-10495
Butcher Road Partners, LLC	9/12/2024	45-5159521	24-10496
California Investment Properties, a California corporation	9/12/2024	30-0289474	24-10543
Cambria Pine, LP	9/12/2024	83-2644771	24-10497
Chestnut Oak, LP	9/12/2024	87-4702239	24-10498
Country Oaks I, LP	9/12/2024	26-0860694	24-10499
Divi Divi Tree, L.P.	9/12/2024	71-0926806	24-10500
Douglas Fir Investments, LP	9/12/2024	47-4674444	24-10501
Firetree I, LP	9/12/2024	82-3519393	24-10502
Firetree II, LP	9/12/2024	82-3519554	24-10503
Firetree III, LP	9/12/2024	82-3919655	24-10504
Foxtail Pine, LP	9/12/2024	83-2643197	24-10505
Ginko Tree, LP	9/12/2024	88-2960976	24-10506
Golden Tree, LP	9/12/2024	82-1060045	24-10507
Hagar Properties, LP	9/12/2024	04-3598044	24-10508

Debtor Name	Petition Date	Tax ID	Case No.
Heacock Park Apartments, LP	9/12/2024	46-3737509	24-10509
Home Tax Service of America, Inc., dba LeFever Mattson Property Management	9/12/2024	68-0262554	24-10544
LeFever Mattson I, LLC	9/12/2024	47-4960075	24-10510
LeFever Mattson, a California corporation	9/12/2024	68-0197537	24-10545
Live Oak Investments, LP	9/12/2024	47-3786181	24-10511
Monterey Pine, LP	9/12/2024	83-2644824	24-10512
Napa Elm, LP	9/12/2024	54-2090332	24-10513
Nut Pine, LP	9/12/2024	83-2661795	24-10514
Pinecone, LP	9/12/2024	84-2395880	24-10515
Pinewood Condominiums, LP	10/2/2024	54-2090329	24-10598
Ponderosa Pines, LP	10/2/2024	N/A	24-10599
Red Cedar Tree, LP	9/12/2024	88-3572519	24-10517
Red Mulberry Tree, LP	9/12/2024	88-3572594	24-10518
Red Oak Tree, LP	9/12/2024	92-1008382	24-10520
Red Oak, LP	9/12/2024	61-2022650	24-10519
Red Spruce Tree, LP	9/12/2024	92-0780568	24-10521
Redbud Tree, LP	9/12/2024	88-2961999	24-10516
River Birch, LP	9/12/2024	86-3020630	24-10522
River Tree Partners, LP	9/12/2024	81-3671554	24-10523
River View Shopping Center 1, LLC	9/12/2024	47-4186147	24-10524
River View Shopping Center 2, LLC	9/12/2024	47-4186476	24-10525
RT Capitol Mall, LP	9/12/2024	81-3775896	24-10526
RT Golden Hills, LP	9/12/2024	81-3708073	24-10527
Scotch Pine, LP	9/12/2024	86-3043628	24-10528

Debtor Name	Petition Date	Tax ID	Case No.
Sequoia Investment Properties, LP	9/12/2024	32-0136044	24-10529
Sienna Pointe, LLC	9/12/2024	47-4712579	24-10530
Spruce Pine, LP	9/12/2024	84-2396399	24-10532
Tradewinds Apartments, LP	9/12/2024	54-2090326	24-10533
Vaca Villa Apartments, LP	9/12/2024	54-2090327	24-10534
Valley Oak Investments, LP	9/12/2024	47-3383417	24-10535
Watertree I, LP	9/12/2024	82-3519819	24-10536
Willow Oak, LP	9/12/2024	87-4700495	24-10537
Windscape Apartments I, LP	9/12/2024	26-0860477	24-10538
Windscape Apartments II, LP	9/12/2024	26-0860509	24-10539
Windscape Apartments, LLC	9/6/2024	83-1597353	24-10417
Windscape Holdings, LLC	9/12/2024	83-1608759	24-10540
Windtree, LP	9/12/2024	82-4974654	24-10541
Yellow Poplar, LP	9/12/2024	86-3043392	24-10542



**Appendix 2 – Identified Properties**

Address	City	State	APN (if known)
200 Wagner Road	Sonoma	CA	128-461-023-000
23570 Arnold Dr			128-461-081-000
72 Wagner Road			128-461-082-000
100 Wagner Road			128-461-084-000
450 West Spain	Sonoma	CA	018-111-042-000
302/304/310 1st Street East	Sonoma	CA	018-171-019-000 018-171-031-000
171 W. Spain Street	Sonoma	CA	018-202-051-000
103/105 Commerce Court	Fairfield	CA	0044-090-490-000 0044-090-500-000
9407-9471 N Fort Washington Rd	Fresno	CA	401-830-01 401-830-02 401-830-03 401-830-04 401-830-05 401-830-06 401-830-07 401-830-08 401-830-09 401-830-10
2151 Salvio Street	Concord	CA	112-137-017-3
941-1017 Alamo Dr.	Vacaville	CA	0127-080-570 0127-080-340
1870 Thornsberry Rd	Sonoma	CA	127-192-056-000
Vineyard 8th Street E	Sonoma	CA	128-422-075-000
802 Studley St	Sonoma	CA	018-443-011-000
801 W. Napa St	Sonoma	CA	018-443-011-000
830-848 Studley St	Sonoma	CA	018-443-022-000
921 Broadway	Sonoma	CA	128-082-011-000
1383 Larkin Drive	Sonoma	CA	023-040-028-000

1	635 Broadway	Sonoma	CA	018-301-010-000
2	645-651 Broadway/10 Maple St	Sonoma	CA	018-301-009-000
3	1161-1167 Broadway	Sonoma	CA	128-181-029-000
4	1151 Broadway	Sonoma	CA	128-181-028-000
5	596 3rd St E	Sonoma	CA	018-271-037-000
6	446 3rd Street West	Sonoma	CA	018-201-003-000
7	454 3rd Street West	Sonoma	CA	018-201-004-000
8	789 Cordilleras	Sonoma	CA	023-010-069-000
9	110 Fordham Circle	Vallejo	CA	0068-243-020
10	905 Broadway St	Fairfield	CA	0030-282-190
11	1621 Hood Rd	Sacramento	CA	285-0021-090-0000
12				285-0021-010-0000
13	5800 Engle Rd	Carmichael	CA	258-0180-043-0000
14	7575 Power Inn Rd	Sacramento	CA	051-0200-093
15				051-0467-052
16	7337 Power Inn Rd	Sacramento	CA	051-0231-014
17				051-0231-016
18				051-0231-015
19	1190 Dana Dr	Fairfield	CA	0033-042-400
20	1189 Dana Dr	Fairfield	CA	0033-042-300
21	1050 Elm St	Napa	CA	005-123-013-000
22	3310 Cimmarron Rd	Cameron Park	CA	116-311-001-000
23	3320 Cimmarron Rd			116-311-002-000
24	3336 Cimmarron Rd			116-311-003-000
25	500 Jackson St	Fairfield	CA	0030-244-130
26	501 - 523 Carpenter St; 1035 - 1037 Washington St	Fairfield	CA	0030-152-010
27	453 Fleming Ave E	Vallejo	CA	0069-222-010
28				0069-222-020
	5800 Fair Oaks Blvd	Carmichael	CA	283-0050-034-0000

1	3217 Walnut Ave	Carmichael	CA	271-0313-030-000
2	170 - 182 1st Street East	Sonoma	CA	092-010-014-000 092-010-015-000
3				
4	520 Capitol Mall	Sacramento	CA	006-146-031-000
5	6359 Auburn Blvd	Citrus Heights	CA	229-160-013-000
6	2280 Bates Ave	Concord	CA	159-070-015-700
7	19450 Old Winery Rd	Sonoma	CA	127-242-049-000
8	222-226 W. Spain St	Sonoma	CA	018-151-005-000
9	24265 Arnold Dr	Sonoma	CA	128-484-009-000
10	24321 Arnold Dr	Sonoma	CA	128-484-010-000
11	786 Broadway	Sonoma	CA	018-352-043-000
12	790 Broadway	Sonoma	CA	018-352-044-000
13	18580 Sonoma Highway	Sonoma	CA	056-501-059-000
14	453/457/459 2nd St W	Sonoma	CA	018-201-016-000
15	17700 Sonoma Highway	Sonoma	CA	056-303-025-000
16	1319-1361 Fulton Ave	Sacramento	CA	285-152-031-000
17	377 West Spain Street	Sonoma	CA	018-192-028-000
18	20564 Broadway	Sonoma	CA	128-321-008-000
19	653 3rd Street W	Sonoma	CA	018-283-005-000
20	391-455 Oak Street; 19173 Railroad Ave	Sonoma	CA	052-402-022-000
21	19020 Railroad Ave.	Sonoma	CA	052-351-028-000
22	19022 A&B Railroad Ave. 19030 Railroad Ave.			
23	8th St E	Sonoma	CA	128-381-027-000
24	21885 8th St E	Sonoma	CA	128-381-028-000
25	141-145 E. Napa Street	Sonoma	CA	018-261-006-000
26	151 E Napa Street	Sonoma	CA	018-261-023-000
27	241 1st Street West	Sonoma	CA	018-121-005-000
28				

1	23250 Maffei Road	Sonoma	CA	128-461-009-000 128-471-012-000
2				
3	20490 Broadway	Sonoma	CA	128-262-003-000
4	925-927 Broadway Street	Sonoma	CA	128-082-015-000
5	967 Broadway Street	Sonoma	CA	128-690-009-000
6	101 Meadowlark Lane	Sonoma	CA	128-484-013-000
7	24101 Arnold Drive	Sonoma	CA	128-484-003-000
8	24151 Arnold Drive	Sonoma	CA	128-484-024-000
9	310 Meadowlark	Sonoma	CA	128-484-014-000
10	201 Meadowlark	Sonoma	CA	128-484-033-000 128-484-034-000
11				
12	16721 Sonoma Highway	Sonoma	CA	056-562-020-000
13	18585 Manzanita Road	Sonoma	CA	056-501-036-000
14	1130 Pear Tree Lane	Napa	CA	044-500-007-000
15	157 James River Road	Vallejo	CA	079-351-010-000
16	258 Lorraine Blvd.	San Leandro	CA	075-0171-013
17	533 Bella Vista Drive	Suisun City	CA	0174-234-200
18	5601 Walnut Avenue #4	Orangevale	CA	235-0420-053-0023
19	5701/5703 Orange Ave	Sacramento	CA	050-0411-002-0000
20	830 Illinois Street #1-4	Fairfield	CA	0030-312-100
21	1173 Araquipa Court	Vacaville	CA	0127-351-310
22	1191 Araquipa Court	Vacaville	CA	0127-351-340
23	1864 Quail Meadows Circle	Vacaville	CA	132-042-170-000
24	4920 Samo Lane	Fairfield	CA	0174-010-090
25	333 Wilkerson Ave.	Perris	CA	310-061-023
26	371 Wilkerson Ave.	Perris	CA	310-070-078
27	411 Wilkerson Ave.	Perris	CA	310-081-012
28	No Address	Perris	CA	310-070-077

1	19340 7th St E	Sonoma	CA	127-242-025-000
2	101 Quail Court	Truckee	CA	107-170-033-000
3	102 Quail Court	Truckee	CA	107-170-032-000
4	103 Quail Court	Truckee	CA	107-170-034-000
5	104 Quail Court	Truckee	CA	107-170-031-000
6	107 Quail Court	Truckee	CA	107-170-035-000
7	108 Quail Court	Truckee	CA	107-170-030-000
8	109 Quail Court	Truckee	CA	107-170-036-000
9	10335 Badger Lane	Truckee	CA	107-170-037-000
10	10298 Badger Lane	Truckee	CA	107-170-001-000
11	10300 Badger Lane	Truckee	CA	107-170-002-000
12	10306 Badger Lane	Truckee	CA	107-170-003-000
13	10308 Badger Lane	Truckee	CA	107-170-004-000
14	10316 Badger Lane	Truckee	CA	107-170-005-000
15	10318 Badger Lane	Truckee	CA	107-170-006-000
16	10326 Badger Lane	Truckee	CA	107-170-007-000
17	10328 Badger Lane	Truckee	CA	107-170-008-000
18	10333 Badger Lane	Truckee	CA	107-170-038-000
19	10334 Badger Lane	Truckee	CA	107-170-009-000
20	110 Quail Court	Truckee	CA	107-170-029-000
21	10336 Badger Lane	Truckee	CA	107-170-010-000
22	10342 Badger Lane	Truckee	CA	107-170-011-000
23	10344 Badger Lane	Truckee	CA	107-170-012-000
24	10350 Badger Lane	Truckee	CA	107-170-013-000
25	10352 Badger Lane	Truckee	CA	107-170-014-000
26	10358 Badger Lane	Truckee	CA	107-170-015-000
27	10360 Badger Lane	Truckee	CA	107-170-016-000
28				

1	10366 Badger Lane	Truckee	CA	107-170-017-000
2	10368 Badger Lane	Truckee	CA	107-170-018-000
3	10378 Badger Lane	Truckee	CA	107-170-019-000
4	10379 Badger Lane	Truckee	CA	107-170-028-000
5	10380 Badger Lane	Truckee	CA	107-170-020-000
6	10381 Badger Lane	Truckee	CA	107-170-027-000
7	10386 Badger Lane	Truckee	CA	107-170-021-000
8	10388 Badger Lane	Truckee	CA	107-170-022-000
9	10393 Badger Lane	Truckee	CA	107-170-026-000
10	10394 Badger Lane	Truckee	CA	107-170-023-000
11	10395 Badger Lane	Truckee	CA	107-170-025-000
12	10396 Badger Lane	Truckee	CA	107-170-024-000
13	Pinyon Creek Common Area	Truckee	CA	107-170-039-000
14				107-170-040-000
15				107-170-041-000
16	<i>Intentionally Omitted</i>			
17	2030 E Grayson Rd	Ceres	CA	041-032-023-000
18	9120 Polhemus Drive/9300 Mazatlan Way	Elk Grove	CA	125-0203-016-0000
19	7210/7212 Grady Drive	Citrus Heights	CA	243-0311-020-0000
20	7300 Berna/7325 Arleta	Sacramento	CA	050-0412-004-0000
21	7303/7305 Berna Way	Sacramento	CA	050-0411-009-0000
22	7304/7306 Arleta Court	Sacramento	CA	050-0411-014-0000
23	7308/7310 Arleta Court	Sacramento	CA	050-0411-015-0000
24	7312/7314 Berna Way	Sacramento	CA	050-0412-007-0000
25	7316/7318 Arleta Court	Sacramento	CA	050-0411-017-0000
26	7319 Arleta/7301 Berna	Sacramento	CA	050-0411-005-0000
27	7320/7322 Arleta Court	Sacramento	CA	050-0411-018-0000
28	7319/7321 Berna Way	Sacramento	CA	050-0411-005-0000

1	7324/7326 Arleta Court	Sacramento	CA	050-0411-019-0000
2	7327/7329 Berna Way	Sacramento	CA	050-0411-003-0000
3	7328/7330 Arleta Court	Sacramento	CA	050-0411-020-0000
4	7332/7334 Arleta Court	Sacramento	CA	050-0411-021-0000
5	7339/7341 Arleta Court	Sacramento	CA	050-0412-002-0000
6	6346/6348 Sorrell Court	Citrus Heights	CA	209-0380-032-0000
7	5509 Orange Ave/7343 Arleta	Sacramento	CA	050-0412-001-0000
8	5513/5515 Missie Way	Sacramento	CA	228-0520-015-0000
9	5521/5523 Missie Way	Sacramento	CA	228-0520-017-0000
10	5335/5337 Gibbons Drive	Carmichael	CA	258-0191-033-0000
11	5537/5539 Missie Way	Sacramento	CA	228-0520-021-0000
12	5605 Orange Avenue/7320 Berna Way	Sacramento	CA	050-0412-008-0000
13	5601/5603 Orange Avenue	Sacramento	CA	050-0412-009-0000
14	7335/7337 Arleta Court	Sacramento	CA	050-0412-003-0000
15	430 W. Spain Street	Sonoma	CA	018-111-059-000
16	400 West Spain	Sonoma	CA	018-111-058-000
17	370 Butcher Rd	Vacaville	CA	127-070-310
18	280 Butcher Road	Vacaville	CA	127-070-410
19	310 Butcher Road	Vacaville	CA	127-070-300
20	312 Butcher Road	Vacaville	CA	127-431-200
21	350 Butcher Road	Vacaville	CA	127-070-030
22	7456 Foothills Blvd	Roseville	CA	477-100-031-000
23	4950 Allison Parkway	Vacaville	CA	0133-330-020
24	4960 Allison Parkway			0133-330-030
25	4970 Allison Parkway			0133-330-040
26	18935 5th St W	Sonoma	CA	127-101-018-000
27	430 West Napa	Sonoma	CA	018-193-048-000
28	446 W. Napa	Sonoma	CA	018-193-041-000

1	454 W. Napa	Sonoma	CA	018-193-040-000
2	462 W. Napa	Sonoma	CA	018-193-039
3	24160 Turkey Rd/24237 Arnold Rd.	Sonoma	CA	128-484-066-000 128-484-067-000
4				
5	1025 Napa St	Sonoma	CA	126-032-037-000
6	900 E Napa St	Sonoma	CA	127-231-040-000
7	424 2nd St W	Sonoma	CA	018-202-002-000
8	24120 Arnold Dr	Sonoma	CA	128-461-029-000
9	525 W Napa	Sonoma	CA	018-530-054-000
10	520/530/532 Studley St	Sonoma	CA	018-530-014-000
11	18701 Gehricke Road	Sonoma	CA	127-051-073-000 127-051-074-000
12				
13	1045 Bart Rd	Sonoma	CA	127-051-059-000
14	5818 Engle Rd	Carmichael	CA	258-0810-014
15	8340 / 8350 Auburn Boulevard	Citrus Heights	CA	204-0461-042
16	1716 Oceanfront	Del Mar	CA	299-232-09-00
17	1549 E Napa St	Sonoma	CA	127-312-059-000
18	476 W Spain St	Sonoma	CA	018-111-032-000
19	19357 Hwy 12	Sonoma	CA	
20	18590 Hwy 12	Sonoma	CA	
21	18275 Hwy 12	Sonoma	CA	
22	18010 Hwy 12	Sonoma	CA	
23	452 1st St E #C	Sonoma	CA	018-790-003-000
24	450 1st St E #J	Sonoma	CA	018-790-018-000
25	450 1st St E #ABK	Sonoma	CA	
26	22 Boyes Blvd	Boyes Hot Springs	CA	056-402-001-000
27	414 W Napa St	Sonoma	CA	018-193-047-000
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1				0080-380-020
2				0080-380-030
3				0080-380-040
4				0080-380-050
5	5200-5234 Gateway Plaza	Benicia	CA	0080-380-060
6	4321 1st St	Pleasanton	CA	094-0106-004-04
7				300-331-14-01
8	531-533 Camino Del Mar	Del Mar	CA	300-331-14-02
9	1819 Coast Blvd	Del Mar	CA	299-144-13-00
10	62 Farragut Ave	Piedmont	CA	51-4786-7
11	62 Farragut Ave	Piedmont	CA	51-4786-8
12	210 La Salle	Piedmont	CA	
13				051-4700-012
14	415 Pacific Ave	Piedmont	CA	051-4700-013
15	236 King Ave	Piedmont	CA	
16	3200 Castle Rd	Sonoma	CA	
17	3003 Castle Rd	Sonoma	CA	
18	969 Rachel Rd	Sonoma	CA	127-540-001
19	856 4th St E	Sonoma	CA	018-381-050
20	450 1st St E #G	Sonoma	CA	018-790-016
21	405 London Way	Sonoma	CA	
22	454 15th St	Del Mar	CA	299-280-29-00
23	1834/36 Ocean Front	Del Mar	CA	
24	1745 Grand Ave	Del Mar	CA	
25	157 26th St	Del Mar	CA	
26	23105 Millerick Rd	Sonoma	CA	
27	22666 Broadway	Sonoma	CA	128-422-040-000
28	1014 1st St W	Sonoma	CA	128-083-012
	230 E Napa St	Sonoma	CA	128-222-009

1	68359 Jolon Rd	Bradley	CA	423-361-005-000
2	1220 E. Napa St.	Sonoma	CA	127-242-037
3	19179 Railroad Ave	Sonoma	CA	052-402-023
4	1200 Apple Tree Ct.	Sonoma	CA	127-242-035
5	1221 Apple Tree Ct.	Sonoma	CA	127-242-033
6	282 Patten St.	Sonoma	CA	018-262-023-000
7	320 East C Street	Dixon	CA	115-085-010
8	414 Manzanita Ave	Fairfield	CA	162-101-150
9	5120 Lovall Valley Loop Rd	Sonoma	CA	050-372-004-000
10	821 Lovall Valley Loop Rd	Sonoma	CA	127-171-012-000
11	528 Third St	Sonoma	CA	018-251-003
12	870 E. Napa St	Sonoma	CA	
13	19355 Seventh St E	Sonoma	CA	127-231-015
14	20470 Eighth St E	Sonoma	CA	
15				018-162-001
16	2 W. Spain St	Sonoma	CA	018-162-022
17	18285 Sonoma Highway	Sonoma	CA	
18	72 Moon Mountain Rd	Sonoma	CA	056-562-021-000
19	74 Moon Mountain Rd	Sonoma	CA	056-562-022-000
20	443 Casabonne Ln	Sonoma	CA	018-111-076
21	771 Fifth St E	Sonoma	CA	018-382-032
22				071-0310-009-0000
23	47 - 49 Natoma St	Folsom	CA	071-0310-001-0000
24	860 Charter Way	Redwood City	CA	054-081-010 054-081-140
25				0037-431-010 through
26	1 - 22 Grande Circle	Fairfield	CA	0037-431-230
27	410 Buck Avenue	Vacaville	CA	
28	2755 Baltic Drive	Fairfield	CA	0168-431-010

1	594 Lewis Court	Fairfield	CA	
2	5224 - 5226 Karm Way	Sacramento	CA	
3	2805 Yosemite Blvd	Modesto	CA	033-78-007
4	1881 Quail Meadows Circle	Vacaville	CA	
5	2787 Woodmont Drive	Fairfield	CA	
6	7340/7342 Arleta Ct	Sacramento	CA	050-0411-023
7	7315/7317 Arleta Ct	Sacramento	CA	050-0411-011
8	7336/7338 Arleta Ct	Sacramento	CA	050-0411-022
9	6024 Vista Ave	Sacramento	CA	
10	755 W. H St	Dixon	CA	0113-151-160
11	781 Beechwood Ave	Vallejo	CA	
12	9244/9246 Corinthian Cir	Sacramento	CA	
13	1435 Bell St	Sacramento	CA	
14	33 Village Park Square	Bluffton	SC	R16-045-000-0148
15				0028-750-240
16				0028-750-260
17				0028-750-270
18	300 Chadbourne Rd	Fairfield	CA	0028-750-250
19	1995 Grande Circle	Fairfield	CA	0028-750-290
20	5959 Riverside Blvd	Sacramento	CA	0028-750-300
21	724 Cottonwood St	Woodland	CA	
22	1841 Quail Meadows Circle	Vacaville	CA	0132-041-430
23	1111 Alaska Avenue	Fairfield	CA	0034-011-070
24				0131-030-880
25	555 Elmira Road	Vacaville	CA	0131-030-460
26	304 First St E	Sonoma	CA	0131-030-470
27	333 E. Enos Drive	Santa Maria	CA	018-171-030
28				128-066-010

1				296-103-026-3
2	13325 Heacock Street	Moreno Valley	CA	296-103-025-2
3	3515 W. San Jose Avenue	Fresno	CA	415-044-25
4	4727 Hackberry Lane	Carmichael	CA	230-0221-016
5	1118 Araquipa Court	Vacaville	CA	0127-352-340
6	1214 Araquipa Court	Vacaville	CA	0127-352-220
7	1220 Araquipa Court	Vacaville	CA	0127-352-210
8	1209 Araquipa Court	Vacaville	CA	0127-351-360
9	1226 Araquipa Court	Vacaville	CA	0127-352-200
10	3557 Golf View Terrace	Santa Rosa	CA	147-410-020-000
11	4540 St. Andrews Court	Fairfield	CA	0147-161-010
12	1176 Castle Road	Sonoma	CA	127-111-055
13	1720-1722 The Strand	Manhattan Beach	CA	4178-005-007
14	1170 Castle Road	Sonoma	CA	127-111-054
15	1823/1825 Coast Blvd	Del Mar	CA	299-144-12
16	721 Camino Del Mar	Del Mar	CA	300-231-11
17	1834/1836 Oceanfront	Del Mar	CA	299-147-05
18	2052 Wilkins Ave	Napa	CA	
19	5819 Filaree Heights	Malibu	CA	4469-014-012
20	432 E Napa St	Sonoma	CA	018-860-001
21	383 Oak St	El Verano	CA	052-402-011
22	21219 Heron Drive	Bodega Bay	CA	100-255-005
23	405/407 London Way	Agua Caliente	CA	056-564-023
24	1230 E. Napa St.	Sonoma	CA	127-242-038
25	834 Donner Ave	Sonoma	CA	018-363-014
26	2377 Lovall Valley Rd	Sonoma	CA	127-192-051
27	3rd St. E	Sonoma	CA	018-363-004
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1300 North L Street	Lompoc	CA	089-490-01 089-490-02
7385 Greenhaven Dr	Sacramento	CA	031-0053-019
395 - 397 Coombs St 1203 - 1219 Laurel St	Napa	CA	
2306/2376 Fairfield Ave	Fairfield	CA	
5421 Allison Way	Keyes	CA	045-066-015
7 Autumn Creek Ct	Napa	CA	046-122-016
902 Enterprise	Napa	CA	
2237/2257 Hurley Way	Sacramento	CA	285-0140-009 285-0140-032
13933 Chagall Court	Moreno Valley	CA	
20172 Northcove Square			

**Appendix 3 – Identified Entities**

- a. Douglas Fir Investments D, LLC
- b. Food Pavilion I, Ltd.
- c. Foothill Pine, LP
- d. Hood Partners LLC
- e. Jack Harouni, LLC
- f. Lassen Partners, LLC
- g. LM Single Family Holdings LP
- h. KS Mattson Partners, LP
- i. McKinley Partners, LLC
- j. Napa Elm I, LLC
- k. Perris Freeway Plaza, LP
- l. Perris Investors II, LLC
- m. Red Hickory Tree, LP
- n. Ringmaster's Square, LLC
- o. Specialty Properties Partners, LP
- p. Specialty Sales Classics, Inc.
- q. Specialty Sales Global, Inc.
- r. The Laurel Wreath Foundation, Inc.
- s. Treehouse Investments, LP
- t. Waters Edge Riverside Properties, LLC
- u. Windscape Apartments I D, LLC
- v. Windscape Apartments II D, LLC
- w. Woodland Oaks Investments, LLC

**EXHIBIT 2**  
**Declaration of Steven W. Golden, Esq.**

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Debra I. Grassgreen (CA Bar No. 169978)  
John D. Fiero (CA Bar No. 136557)  
Jason H. Rosell (CA Bar No. 269126)  
Steven W. Golden (admitted pro hac vice)  
Gillian N. Brown (CA Bar No. 205132)  
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Facsimile: 415-263-7010  
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jrosell@pszjlaw.com  
sgolden@pszjlaw.com  
gbrown@pszjlaw.com

*Counsel to the Official Committee  
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California  
corporation, *et al.*,<sup>1</sup>

Debtors.

Case No.: 24-10545

(Jointly Administered)

Chapter 11

**DECLARATION OF STEVEN W. GOLDEN  
IN SUPPORT OF THE *EX PARTE*  
APPLICATION OF THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS FOR ENTRY OF AN ORDER  
PURSUANT TO BANKRUPTCY RULE 2004  
AUTHORIZING ORAL EXAMINATION OF  
AND PRODUCTION OF DOCUMENTS BY  
STEWART TITLE OF CALIFORNIA, INC.  
AKA STEWART TITLE OF  
SACRAMENTO**

<sup>1</sup> The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in the above-captioned chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.



1 I, Steven W. Golden, declare under penalty of perjury as follows:

2 1. I am a partner at the law firm of Pachulski Stang Ziehl & Jones LLP (“PSZJ”),  
3 counsel to the Official Committee of Unsecured Creditors (“Committee”) in the above-captioned  
4 case. My office address and phone number at PSZJ are 919 N. Market Street, 17<sup>th</sup> Floor,  
5 Wilmington, DE 19801; (302) 652-4100. I am a member in good standing of the bars of New  
6 York, Texas, Maryland, Pennsylvania, and Delaware.

7 2. On December 2, 2024, this Court entered an order admitting my application for  
8 admission pro hac vice in this case. *See* Docket No. 395.

9 3. I submit this Declaration in support of the *EX PARTE* APPLICATION OF THE  
10 OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER  
11 PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING ORAL EXAMINATION OF AND  
12 PRODUCTION OF DOCUMENTS BY STEWART TITLE OF CALIFORNIA, INC., AKA  
13 STEWART TITLE OF SACRAMENTO (the “Application”) to which this Declaration is appended.  
14 I have personal knowledge of the facts set forth in this Declaration unless otherwise stated.

15 4. As set forth in the First-Day Declaration of Bradley Sharp, the Debtors’ Chief  
16 Restructuring Officer, Kenneth Mattson, one of the Debtors’ founders and former principals,  
17 “appears to have used LeFever Mattson to facilitate a years-long campaign of self-serving  
18 transactions, many of which were not recorded in the books and records of LeFever Mattson, the  
19 Debtor, or any of the other LPs or LLCs (collectively, the “Mattson Transactions”).”<sup>2</sup> The  
20 Committee’s professionals are conducting an investigation (the “Committee Investigation”) into the  
21 Mattson Transactions (including the Mattson Interest Sales and Mattson Property Sales, each as  
22 defined in the First-Day Declaration), and other potential claims and causes of action that may be  
23 asserted against non-Debtors.  
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28 <sup>2</sup> *See Declaration of Bradley D. Sharp in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 5] (the  
“First-Day Decl.”), ¶ 27.

5. Mr. Sharp further described one category of Mattson Transactions as follows:

Mr. Mattson caused certain of the LPs and LLCs to purchase properties owned by Mr. Mattson's own investment company—by executing the transactions himself on behalf of both buyer and seller (collectively, the “Mattson Property Sales”). . . . The Mattson Property Sales have clouded title on a significant portion of the LeFever Mattson real estate portfolio, and a number of LPs and LLCs now hold properties, obtained through Mattson Property Sales, that are encumbered by loans that are in default.<sup>3</sup>

6. Based on the Committee Investigation thus far, the Committee believes that Mr. Mattson and/or his non-Debtor investment vehicles are in the chain of title of a significant portion of the Debtors' property portfolio, both as of the Petition Dates in these cases and historically. Based on its review of available information, the Committee believes that Stewart, as a title company involved in some transactions in which the Debtors purchased and/or sold real property (including Mattson Property Sales), may have records that will assist the Committee in evaluating the chain of title to that “significant portion of the LeFever Mattson real estate portfolio,” and, in turn, various potential claims and causes of action that are the subject of the Committee Investigation. This information is critical to a determination interests of a variety of parties in these bankruptcy cases, including the investors in LeFever Mattson who, based on the filed proofs of claim and interest, constitute a majority of the Committee's constituency..

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on March 10, 2025 at Wilmington, Delaware.

By: /s/ Steven W. Golden  
Steven W. Golden

<sup>3</sup> See *id.*, ¶ 17.

**EXHIBIT 3**  
**Proposed Form of Order Granting *Ex Parte* Application**

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Debra I. Grassgreen (CA Bar No. 169978)  
John D. Fiero (CA Bar No. 136557)  
Jason H. Rosell (CA Bar No. 269126)  
Steven W. Golden (*pro hac vice* pending)  
Gillian N. Brown (CA Bar No. 205132)  
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gbrown@pszjlaw.com

*Counsel to the Official Committee  
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California  
corporation, *et al.*,<sup>1</sup>

Debtors.

Case No.: 24-10545

(Jointly Administered)

Chapter 11

**ORDER GRANTING THE *EX PARTE*  
APPLICATION OF THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS FOR ENTRY OF AN ORDER  
PURSUANT TO BANKRUPTCY RULE 2004  
AUTHORIZING ORAL EXAMINATION OF  
AND PRODUCTION OF DOCUMENTS BY  
STEWART TITLE OF CALIFORNIA, INC.  
AKA STEWART TITLE OF  
SACRAMENTO**

<sup>1</sup> The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in the above-captioned chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

1           Upon consideration of the *EX PARTE* APPLICATION OF THE OFFICIAL COMMITTEE  
2 OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY  
3 RULE 2004 AUTHORIZING ORAL EXAMINATION OF AND PRODUCTION OF  
4 DOCUMENTS BY STEWART TITLE OF CALIFORNIA, INC. AKA STEWART TITLE OF  
5 SACRAMENTO (the “Application”) [Doc. No. \_\_\_\_], the record in this case, and for good and  
6 sufficient cause appearing,

7           IT IS HEREBY ORDERED AS FOLLOWS:

- 8           1.       The Application is GRANTED.
- 9           2.       The Official Committee of Unsecured Creditors is authorized to issue a subpoena  
10 directed to Stewart Title of California, Inc. aka Stewart Title of Sacramento (“Stewart”) requiring  
11 Stewart to (a) complete its production, by **April 4, 2025**, of documents responsive to the Requests for  
12 Production (the “Requests”) set forth substantially in the form attached as **Exhibit 1** to the  
13 Application; and (b) provide oral testimony on a mutually agreed date no later than **April 30, 2025**  
14 (unless the Committee and Stewart agree to extend that date) relating to (i) Stewart’s search for and  
15 possession, custody, or control of documents responsive to the Requests; and (ii) the subject matter of  
16 the Requests.

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18                               **\*\*END OF ORDER\*\***  
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Debra I. Grassgreen (CA Bar No. 169978)  
John D. Fiero (CA Bar No. 136557)  
Jason H. Rosell (CA Bar No. 269126)  
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*Counsel to the Official Committee  
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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California  
corporation, *et al.*,<sup>1</sup>  
  
Debtors.

Case No.: 24-10545  
(Jointly Administered)  
Chapter 11

**CERTIFICATE OF SERVICE**

<sup>1</sup> The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in the above-captioned chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

STATE OF CALIFORNIA )  
 )  
CITY OF LOS ANGELES )

I, Maria R. Viramontes, am employed in the city and county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 10100 Santa Monica Blvd., Suite 1300, Los Angeles, California 90067.

On March 10, 2025, I caused to be served the **EX PARTE APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING ORAL EXAMINATION OF AND PRODUCTION OF DOCUMENTS BY STEWART TITLE OF CALIFORNIA, INC. AKA STEWART TITLE OF SACRAMENTO; DECLARATION OF STEVEN W. GOLDEN, ESQ.** in the manner stated below:

<input checked="" type="checkbox"/>	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document was served by the court via NEF and hyperlink to the document. On March 10, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below. See Attached.
<input checked="" type="checkbox"/>	(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.  Stewart Title of California, Inc. c/o CT Corporation 330 N. Brand Blvd. Glendale, CA 91203  Stewart Title of California, Inc. 5729 Sunrise Blvd. Citrus Heights, CA 95610 ATTN: Legal Department

I declare under penalty of perjury, under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on March 10, 2025, at Los Angeles, California.

/s/ Maria R. Viramontes  
Maria R. Viramontes

**TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

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4903-1915-9590.1 52011.00002



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